

# EXHIBIT 4

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, TYLER MAGILL, APRIL  
MUNIZ, HANNAH PEARCE, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES ALEX  
FIELDS, JR., VANGUARD AMERICA,  
ANDREW ANGLIN, MOONBASE  
HOLDINGS, LLC, ROBERT "AZZMADOR"  
RAY, NATHAN DAMIGO, ELLIOTT  
KLINE a/k/a ELI MOSELEY, IDENTITY  
EVROPA, MATTHEW HEIMBACH, MATTHEW  
PARROTT a/k/a DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS, LEAGUE  
OF THE SOUTH, JEFF SCHOEP, NATIONAL  
SOCIALIST MOVEMENT, NATIONALIST  
FRONT, AUGUSTUS SOL INVICTUS,  
FRATERNAL ORDER OF THE ALT-KNIGHTS,  
MICHAEL "ENOCK" PEINOVICH, LOYAL  
WHITE KNIGHTS OF THE KU KLUX KLAN,  
and EAST COAST KNIGHTS OF THE KU KLUX  
KLAN a/k/a EAST COAST KNIGHTS OF THE  
TRUE INVISIBLE EMPIRE,

Defendants.

DEFENDANT FIELDS' ANSWERS TO PLAINTIFFS' SECOND SET OF  
INTERROGATORIES TO ALL INDIVIDUAL DEFENDANTS

COMES NOW Defendant JAMES ALEX FIELDS, JR. ("Fields"), by counsel, and for his  
Answers to Plaintiffs' Second Interrogatories, states as follows:

1. Identify and Describe in Detail each Contact or Communication of any kind you had

with each one of the other Defendants between January 2017 and August 13, 2017, including the nature or content of the Contact or Communication, where and when the Contact or Communication took place, and anyone else who participated in the Contact or Communication.

ANSWER: Fields read and liked or retweeted posts on Twitter, various websites, and social media prior to the Rally on his desktop computer and cell phone. Fields never received any direct communication from any other Defendant on social media. Fields recalls posting a direct message to David Duke, which was unreturned. He also posted a direct message to Richard Spencer, which was also unreturned. Fields does not recall the specific nature of his communication but recalls it related to inquiring about the Rally. Fields does not know all Defendants by face and name, but communicated verbally with individuals he believed to be members of Vanguard America at the rally. This Answer may be supplemented with more specific information regarding verbal communication at the Rally when additional information is available.

2. Identify all expenses You incurred in planning, organizing, or attending the Unite the Right rally and the sources of funding and method of payment used to satisfy those expenses.

ANSWER: Fields drove overnight from Maumee, Ohio to Charlottesville, Virginia the evening of August 11 and morning of August 12 arriving in Charlottesville an hour or two before dawn. His only expense for attending the Rally was fuel for his vehicle. May supplement additional specific information as to method of payment and location of gas stations. Fields incurred no expenses for planning or organizing the Rally, as he did not participate in planning or organizing the Rally.

3. Identify and Describe in Detail each case in which You were charged in a Criminal Proceeding

that resulted in a conviction, whether state or federal, including for each such case: the full title of the action, court, docket number, a description of the allegations, the disposition, and the sentence.

ANSWER: This is public information as readily available to Plaintiffs as to Fields.

Charlottesville Circuit Court, Virginia

- Commonwealth v. Fields, CR17000296-01 – Murder: 1<sup>st</sup> Degree – Tried to a jury and found guilty. Currently under appeal.
- Commonwealth v. Fields, CR17000296-02 – Malicious Wounding – Tried to a jury and found guilty. Currently under appeal.
- Commonwealth v. Fields, CR17000296-03 – Malicious Wounding – Tried to a jury and found guilty. Currently under appeal.
- Commonwealth v. Fields, CR17000296-04 – Aggravated Malicious Wounding – Tried to a jury and found guilty. Currently under appeal.
- Commonwealth v. Fields, CR 17000296-05 – Failure to Stop at Accident involving Death – Tried to a jury and found guilty. Currently under appeal.
- Commonwealth v. Fields, CR17000296-06 – Aggravated Malicious Wounding – Tried to a jury and found guilty. Currently under appeal.
- Commonwealth v. Fields, CR17000296-07 – Aggravated Malicious Wounding – Tried to a jury and found guilty. Currently under appeal.
- Commonwealth v. Fields, CR17000296-08 – Assault with Malice; Victim Injured – Tried to a jury and found guilty. Currently under appeal.
- Commonwealth v. Fields, CR17000296-09 – Aggravated Malicious Wounding – Tried to a jury and found guilty. Currently under appeal.
- Commonwealth v. Fields, CR17000296-10 – Malicious Wounding – Tried to a jury and

found guilty. Currently under appeal.

Western District of Virginia Federal District Court

- Case No. 3:18 CR 00011 (MFU)
- Fields was charged with 30 counts summarized as follows
  - o Count 1 – Violation of 18 U.S.C. §249(a)(1) – Hate Crime Act resulting in Death
  - o Counts 2 – 29 – Violation of 18 U.S.C. §249(a)(1) – Hate Crim Act Involving an Attempt to Kill
  - o Count 30 – Violation of 18 U.S.C. §245 – Bias Motivated Interference with Federally Protected Activity Resulting in Death
- Pursuant to public record, Fields entered into a Plea Agreement wherein he pled guilty to Counts 1 – 29 in exchange for the dismissal of Count 30 and assurance that Capital Punishment would not be sought.

4. Identify each legal matter, whether federal, state, criminal, civil, administrative or otherwise, concerning the Events in which You have been or participated as a party or witness, including but not limited to giving any testimony in depositions, hearings, trial or any other legal proceeding.

ANSWER: In addition to the above-referenced criminal matters and the present case, Fields is a Defendant in the following civil lawsuits:

- Tadrint and Micah Washington v. Fields, et. al. – Charlottesville Circuit Court – CL17-442
- Jeanne Marie Peterson v. Fields and Vanguard America – Charlottesville Circuit Court

Case No. CL19-413

- Mahtab Jamalreza, et. al. v. Fields, et. al. – Charlottesville Circuit Court Case No. CL19-410
- Chelsea Alvarado v. Fields – Fairfax Circuit Court – Case No. CL19-06387
- Susan Diane Bro, Admin of Estate of Heather Heyer v. Fields - Charlottesville Circuit Court – Case No. CL19-449
- Burke v. Fields, et al – U.S. Southern District of Ohio Federal Court (Columbus Division) – Case No. 3:19-cv-00046.

5. Describe in detail any instance in which you Advertised or promoted the Unite the Right rally, whether online or otherwise, including where, when, how and for what period of time You displayed any Advertisement or Promotional Material and the content of such Advertisement or Promotional Material.

ANSWER: Fields does not have access to his social media accounts and has not since August 12, 2017. To the best of his recollection, Fields “liked” and/or “retweeted” a few posts of others about the Rally. Otherwise, none.

6. Identify each Communication concerning the Events that you had with each member of Law Enforcement, whether before, after, or during the Events, including the name of the member of Law Enforcement, when, where and how each Communication took place, and the nature or content of the Communication.

ANSWER: Fields asserts and relies upon his 5<sup>th</sup> Amendment Right of the US Constitution

against self-incrimination as to any communication with law enforcement after the Events. Otherwise, Fields did not communicate with law enforcement prior to the Rally concerning the Events and does not recall any specific conversation with any law enforcement officer during the Rally. He does recall generally overhearing announcements by law enforcement during the Rally declaring an unlawful assembly and instructing people to leave the area.

7. Identify each Communication concerning the Events You had with any Government Official, whether before, after or during the Events, including the name of the Government Official, when, where and how each Communication took place, and the nature or content of each Communication.

ANSWER: : Fields asserts and relies upon his 5<sup>th</sup> Amendment Right of the US Constitution against self-incrimination as to any communication with any Government Official after the Events. Otherwise, Fields did not communicate with Government Official prior to the Rally concerning the Events and does not recall any specific conversation with any Government Official during the Rally. He does recall generally overhearing announcements by law enforcement during the Rally declaring an unlawful assembly and instructing people to leave the area

8. Identify each Communication concerning the Events You had with any School Official, whether before after or during the Events, including the name of the School Official, when, where and how each Communication took place and the nature or content of that Communication.

ANSWER: None.

9. Describe any relationship You have had from January 1, 2017 to the present with any of the Entity Defendants, including any titles, affiliations, positions, or roles You had held with any of those

organizations, the responsibilities with each such title, affiliation, position, or role, and any responsibilities you had within any of the organizations that were not associated with any title, affiliation, position or role.

ANSWER: None.

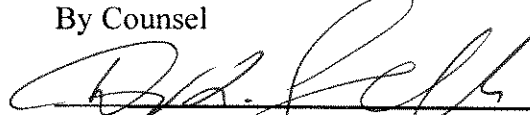
10. For each Act of Violence perpetrated by or against a Defendant or a Plaintiff, identify and describe in Detail each such Act of Violence, where and when such Act of Violence took place, who was involved in such Act of Violence, the nature of the Act of Violence, and any person known to you to have firsthand knowledge such Act of Violence.

ANSWER: : Fields asserts and relies upon his 5<sup>th</sup> Amendment Right of the US Constitution against self-incrimination as to any Act of Violence in which he was allegedly involved.

Respectfully submitted,

JAMES ALEX FIELDS, JR.

By Counsel

A handwritten signature in black ink, appearing to read "David L. Hauck", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that on this 15<sup>th</sup> day of February, 2020, I provided copies of the foregoing via email to the following:

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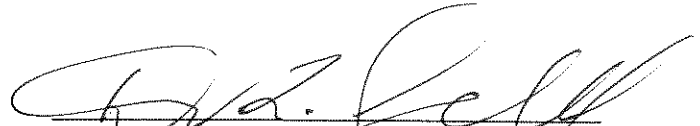
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A handwritten signature in black ink, appearing to read "D.L. Campbell", is written over a horizontal line.

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